



Attorney at Law
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November 17, 2023

Via ECF

Hon. Charles R. Breyer
United States District Judge
Phillip Burton Federal Building
450 Golden Gate Avenue
San Francisco, CA 94102

Re: *In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation*
Case No. 3:23-md-03084-CRB

Dear Judge Breyer:

I am the only female partner in the history of my law firm, Fibich, Leebron, Copeland & Briggs, which is based in Houston, Texas. I am licensed in both Texas and Missouri, and I am admitted to various federal courts across the country, including the US Supreme Court. I have over 22 years of experience working on mass tort product liability litigation, starting as a law clerk, and working my way up to, most recently, serving as the court-appointed Co-Lead of the Paragard IUD multi-district litigation (MDL 2974).

Previously, I served on a number of other leadership committees, including, but not limited to, the Executive Committee for the Essure JCCP which pending in Alameda County Superior Court (Oakland) and the Plaintiffs' Steering Committee for all the TVM MDLs that were pending in the Southern District of West Virginia. In addition to my MDL and JCCP work, myself and my firm have represented a number of survivors of sexual assault and human trafficking. In all of these cases, I worked hand in hand in varying capacities with prominent and well-respected practitioners nationwide, including some submitting applications to leadership in this MDL on and off of the attached exhibit. My track record demonstrates my ability to successfully work with a team in pursuit of justice for Plaintiffs and to work collegially with my opposing counsel as well. It is my hope that the Court will consider my experience as both an asset to this litigation and demonstrative of my ability to work cooperatively with others.

Some of the Judges who have presided over past consolidated litigations on which I have served are as follows:

- Essure JCCP004887 - Hon. Winifred Y. Smith (Ret.) – Alameda County Superior Court
1221 Oak Street, Suite 555
Oakland, CA 94612
(510) 891-6000

- TVM Mesh MDL 2387 *inter alia*– Hon. Joseph R. Goodwin – United States District Court for the Southern District of West Virginia, Charleston Division.
6610 Robert C. Byrd United States Courthouse
300 Virginia Street East,
Charleston. WV 25301
(304) 347-3192
- Paragard MDL 2974 – Hon. Leigh Martin May – United States District Court for the Northern District of Georgia, Atlanta Division
2167 Richard B. Russell Federal Building and United States Courthouse
Chambers-2167, 75 Ted Turner Drive, SW. Atlanta, GA 30303-3309
(404) 215-1510

This application constitutes my express willingness and unequivocal commitment to this time-consuming but extremely important case. Based on my first-hand experience, I fully appreciate the amount of work and resources that will be required of any leadership position. I am wholeheartedly prepared to assume these responsibilities, and I will uphold my duties in accord with the rules of this Court and of professional conduct. I stand ready to pursue all projects in an efficient and thorough manner and to work professionally and collectively towards a just and reasonable conclusion to this litigation on behalf of all who have suffered injuries as a result of enlisting the services of Uber Technologies, Inc.

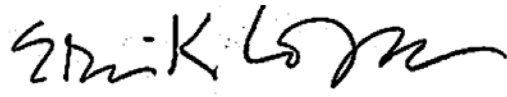
As stated above, I am currently serving as a co-lead in the Paragard litigation, I do recognize that the Court may have some concerns about my ability to commit to a steering committee position here given my role in Paragard. I hope that this formal application and my stated commitment as an Officer of the Court will serve to satisfy Your Honor and my colleagues that I am prepared to fully and personally assume any tasks assigned to me in this litigation. I have successfully worked on multiple litigations at the same time in the past like many other applicants, and I have not allowed such simultaneous appointments to diminish my ability to provide my best work product in every arena.

In sum, because of my personal experience, I understand the importance and necessity of a cohesive and coordinated structure. I am willing and fully capable of working cooperatively and amicably with others on both sides of the docket to handle tasks at all levels and to advance the Uber Technologies, Inc., Passenger Sexual Assault Litigation toward an expeditious, economical, and just resolution. As one part of a very successful and longstanding litigation firm and given my personal successes in other litigations, I also have access to sufficient resources to advance this litigation in a thorough, yet efficient, manner, and I am prepared to contribute the resources necessary.

For all of these reasons, I respectfully request that Your Honor appoint me to the Plaintiffs' Steering Committee. A proposed order appointing leadership is attached as Exhibit A.

Sincerely,

FIBICH LEEBRON COPELAND BRIGGS

By: 
Erin K. Copeland, Attorney

EKC

Encl.

Ex A. Proposed Order Appointing Leadership.

Ex B. Erin Copeland Resume